

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA

CIVIL ACTION FILE NO. 5:23-cv-00059

CROWN EQUIPMENT CORPORATION,)
)
Plaintiff,)

v.)

DAVID BRADY, WILLIAM TUCKER,)
JOSEPH BOGGS, BRAWTUS HOLDING)
COMPANY, INC. (f/k/a Pneu-Mech)
Systems Manufacturing, Inc.),)
BRAWTUS, MANAGEMENT COMPANY,)
LLC, PNEU-MECH SYSTEMS)
MANUFACTURING, LLC (K.N.A. Pneu-)
Mech Dissolution, LLC),)
PNEU-MECH SYSTEMS)
MANUFACTURING, INC., UNITED)
FINISHING SYSTEMS LLC,)

Defendants,)

v.)

JAMES ANDREWS and JERRY)
TROSTLE,)

Third-Party Defendants.)

DEFENDANT JOSEPH BOGGS’
MOTION AND ORDER FOR
EXTENSION OF TIME TO
RESPOND TO PLAINTIFF’S FIRST
SET OF INTERROGATORIES AND
REQUEST FOR PRODUCTION OF
DOCUMENTS

NOW COMES Defendant, Joseph Boggs (“Defendant), and hereby moves the Court, pursuant to Rule 6(b) and Rule 26 of the Federal Rules of Civil Procedure, and Local Rule 7.1, for additional time to respond to Plaintiff’s First Set of Interrogatories, Requests for Production of Documents, and Request for Admissions, through and including October 3, 2024.

In support of this motion, Defendant shows the Court that the deadline to

respond to the subject discovery, August 31, 2024, has not expired, and undersigned counsel needs additional time to respond to each request. The undersigned has consulted with counsel for Plaintiff with regards to the above referenced extension, and counsel for Plaintiff has consented to Defendant's extension request.

WHEREFORE, Defendant requests that he be granted an extension of time to respond to Plaintiff's First Set of Interrogatories and Requests for Production of Documents, through and including **October 3, 2024**.

This the 16th day of August, 2024.

CRANFILL SUMNER LLP

/s/ Ryan L. Bostic

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CERTIFICATE OF SERVICE

I hereby certify that on the 16th day of August, 2024, I electronically filed the foregoing *DEFENDANT JOSEPH BOGGS' MOTION FOR EXTENSION OF TIME TO RESPOND TO PLAINTIFF'S FIRST SET OF INTERROGATORIES AND REQUEST FOR PRODUCTION OF DOCUMENTS* with the Clerk of Court using the CM/ECF system which will send notification of this filing and an electronic copy of same to all counsel of record registered with the CM/ECF system.

<p>Toby K. Henderson Kaitlyn C. Meeks SEBALY SHILLITO + DYER A Legal Professional Association 40 North Main Street 1900 Stratacache Tower Dayton, Ohio 45423 thenderson@ssdlaw.com kmeeks@ssdlaw.com <i>Attorneys for Plaintiff</i> <i>Crown Equipment Corporation</i></p>	<p>Cory B. Patterson Nelson Mullins Riley & Scarborough, LLP 301 South College St., 23rd Floor Charlotte, North Carolina 28202 Cory.patterson@nelsonmullins.com <i>Attorney for Plaintiff</i> <i>Crown Equipment Corporation</i></p>
<p>Abbi Harris, Esq. NAMAN HOWELL SMITH & LEE PLLC 400 Austin Avenue, Suite 800 Waco, TX 76701 aharris@namanhowell.com <i>Attorney for Defendants</i> <i>David Brady, William Tucker, Brawtus Holding, Inc., Pneu-Mech Dissolution, LLC and Brawtus Management</i></p>	<p>Andrew Connors, Esq. DARKHORSE LAW PLLC 119 Tradewynd Drive, Suite B Lynchburg, VA 24502 andrew@darkhorselaw.com <i>Attorney for Defendants</i> <i>David Brady, William Tucker, Brawtus Holding, Inc., Pneu-Mech Dissolution, LLC and Brawtus Management</i></p>
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